

Theodore Stevenson III (*pro hac vice*)
Texas State Bar No. 19196650
tstevenson@mckoolsmith.com
MCKOOL SMITH, P.C.
300 Crescent Court, Suite 1500
Dallas, Texas 75201
Telephone: (214) 978-4000
Fax: (214) 978-4044

Kevin Burgess (*pro hac vice*)
Texas State Bar No. 24006927
kburgess@mckoolsmith.com
Pierre Hubert (*pro hac vice*)
Texas State Bar No. 24002317
phubert@mckoolsmith.com
MCKOOL SMITH, P.C.
300 W. 6th St., Suite 1700
Austin, Texas 78701
Telephone: (512) 692-8700
Fax: (512) 692-8744

Michael D. Rounds
Nevada State Bar No. 4734
mrounds@watsonrounds.com
Ryan J. Cudnik
Nevada State Bar No. 12948
rcudnik@watsonrounds.com
Adam K. Yowell
Nevada State Bar No. 11748
ayowell@watsonrounds.com
WATSON ROUNDS
5371 Kietzke Lane
Reno, NV 89511-2083
Telephone: (775) 324-4100
Fax: (775) 333-8171

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNWIRED PLANET LLC, a Nevada
limited liability company,

Plaintiff,

v.

GOOGLE INC., a California corporation,
Defendant.

Case No. 3:12-cv-00504-MMD-VPC

**UNWIRED PLANET'S MOTION TO
SEAL JOINT STIPULATION AND
ORDER REGARDING JUDGMENT OF
NONINFRINGEMENT FOR ALL
ACCUSED PRODUCTS UNDER THE
COURT'S CLAIM CONSTRUCTION
ORDER**

ORDER

1 Plaintiff Unwired Planet LLC (“Plaintiff”) moves this Court for an order to seal the Joint
2 Stipulation and Order Regarding Judgment of Noninfringement for all Accused Products Under
3 the Court’s Claim Construction Order and exhibits attached to the Declaration of Phillip Aurentz
4 in Support of the Joint Stipulation and Order Regarding Judgment of Noninfringement for all
5 Accused Products Under the Court’s Claim Construction Order. These documents, along with
6 the Joint Stipulation and Order Regarding Judgment of Noninfringement for all Accused
7 Products Under the Court’s Claim Construction Order, are filed concurrently with this motion.
8 Pursuant to the Protective Order entered in this matter (Dkt. 99), “[a]ll transcripts of depositions,
9 exhibits, answers to interrogatories, pleadings, briefs, and other documents submitted to the
10 Court which have been designated as Protected Information, or which contain information so
11 designated, shall be filed under seal in a manner prescribed by the Court for such filings.” LR
12 10-5(b) provides in part “...papers filed with the Court under seal shall be accompanied by a
13 motion for leave to file those documents under seal, and shall be filed in accordance with the
14 Court’s electronic filing procedures.” The Joint Stipulation and Order Regarding Judgment of
15 Noninfringement for all Accused Products Under the Court’s Claim Construction Order and
16 exhibits attached to the Declaration of Phillip Aurentz in Support of the parties’ Joint Stipulation
17 and Order Regarding Judgment of Noninfringement for all Accused Products Under the Court’s
18 Claim Construction Order contain and/or refer to information designated by the parties as
19 CONFIDENTIAL – OUTSIDE ATTORNEY’S EYES ONLY or RESTRICTED
20 CONFIDENTIAL – SOURCE CODE under the Protective Order.
21

22 Accordingly, to maintain the confidentiality of the documents and things pursuant to the
23 June 4, 2013 Protective Order, Plaintiff requests that the above-referenced Joint Stipulation and
24 Order Regarding Judgment of Noninfringement for all Accused Products Under the Court’s
25 Claim Construction Order and exhibits attached to the Declaration of Phillip Aurentz in Support
26

1 of the Joint Stipulation and Order Regarding Judgment of Noninfringement for all Accused
2 Products Under the Court's Claim Construction Order be filed under seal. A publicly available
3 version of the Joint Stipulation and Order Regarding Judgment of Noninfringement for all
4 Accused Products Under the Court's Claim Construction Order and exhibits attached to the
5 Declaration of Phillip Aurentz in the Joint Stipulation and Order Regarding Judgment of
6 Noninfringement for all Accused Products Under the Court's Claim Construction Order will be
7 filed separately with the Court.
8

9 Dated: March 26, 2015

Respectfully submitted,

10 WATSON ROUNDS

11 /s/ Michael D. Rounds

12 Michael D. Rounds
13 Nevada State Bar No. 4734
mrounds@watsonrounds.com
14 Ryan J. Cudnik
Nevada State Bar No. 12948
rcudnik@watsonrounds.com
15 Adam K. Yowell
Nevada State Bar No. 11748
ayowell@watsonrounds.com
16 WATSON ROUNDS
17 5371 Kietzke Lane
18 Reno, Nevada 89511
Telephone: (775) 324-4100
19 Fax: (775) 333-8171
20
21
22
23
24
25
26
27
28

1 Theodore Stevenson III (*pro hac vice*)
2 Texas State Bar No. 19196650
3 tstevenson@mckoolsmith.com
4 MCKOOL SMITH, P.C.
5 300 Crescent Court, Suite 1500
6 Dallas, Texas 75201
7 Telephone: (214) 978-4000
8 Fax: (214) 978-4044

9 Kevin Burgess (*pro hac vice*)
10 Texas State Bar No. 24006927
11 kburgess@mckoolsmith.com
12 Pierre Hubert (*pro hac vice*)
13 Texas State Bar No. 24002317
14 phubert@mckoolsmith.com
15 MCKOOL SMITH, P.C.
16 300 W. 6th St., Suite 1700
17 Austin, Texas 78701
18 Telephone: (512) 692-8700
19 Fax: (512) 692-8744

20 ***ATTORNEYS FOR PLAINTIFF***
21 ***UNWIRED PLANET LLC***

22 **IT IS SO ORDERED**

23 
24 **UNITED STATES DISTRICT JUDGE**

25 **DATED: March 27, 2015**